

1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)  
nchatterjee@orrick.com  
2 JULIO C. AVALOS (STATE BAR NO. 255350)  
javalos@orrick.com  
3 ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
4 Menlo Park, CA 94025  
Telephone: +1-650-614-7400  
5 Facsimile: +1-650-614-7401

6 THOMAS J. GRAY (STATE BAR NO. 191411)  
tgray@orrick.com  
7 ORRICK, HERRINGTON & SUTCLIFFE LLP  
4 Park Plaza  
8 Suite 1600  
Irvine, CA 92614-2558  
9 Telephone: +1-949-567-6700  
Facsimile: 949-567 6710

10 Attorneys for Plaintiff  
11 FACEBOOK, INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

16 FACEBOOK, INC.,

Case No. 5:08-cv-03468 JF

17 Plaintiff,

**[PROPOSED] ORDER  
COMPELLING DEFENDANTS TO  
RESPOND TO FACEBOOK'S  
DISCOVERY REQUESTS**

18 v.

19 STUDIVZ LTD., HOTLZBRINCK  
NETWORKS GmbH, HOLTZBRINCK  
20 VENTURES GmbH, and DOES 1-25,

Date: March 3, 2009  
Time: 10:00 a.m.  
Room: Courtroom 2, 5th Floor  
  
Judge: Honorable Magistrate Judge  
Howard R. Lloyd, for  
Discovery Purposes

21 Defendants.

22

23

24

25

26

27

28

[PROPOSED] ORDER COMPELLING DEFENDANTS  
TO RESPOND TO DISCOVERY REQUESTS  
CASE NO.: 5:08-cv-03468

1 The Court, having considered Facebook, Inc.’s (“Facebook”) Motion to Compel  
2 Discovery Responses, the declarations filed in support thereof, and the records on file in this  
3 action, hereby orders as follows:

4 IT IS HEREBY ORDERED that Defendants StudiVZ Ltd., Holtzbrinck Ventures  
5 GmbH and Holtzbrinck Networks GmbH (“Defendants”) respond fully to Facebook’s  
6 Interrogatories Nos. 1, 2, 9, 10, 15, 16 and that Defendants produce documents responsive to  
7 Facebook Requests for Production Nos. 1, 13, 14, 16, 23, 25, 27, 28, 29, including all documents  
8 and things related to StudiVZ’s accessing or using of Facebook’s website, servers and intellectual  
9 property, all design, development and implementation documentation, and the computer source  
10 code for Defendants’ websites.

IT IS FURTHER ORDERED that a Special Discovery Master be assigned to be present at all discovery events, including meet and confers between the parties and any depositions of Defendants' witnesses.

14 IT IS SO ORDERED.

16 || Dated:

Honorable Howard R. Lloyd  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 27, 2009.

Dated: January 27, 2009.

Respectfully submitted,

/s/ Thomas J. Gray  
Thomas J. Gray